



SDMS DocID 2075225

MICHIGAN STATE
UNIVERSITY

August 26, 2005

Harry R. Steinmetz
Director, Hazardous Site Cleanup Division
United States Environmental Protection Agency
1650 Arch Street
Philadelphia, Pa 19103-2029

Re: Safety Light Corporation Site
Bloomsburg, Pennsylvania

Dear Mr. Steinmetz:

This correspondence is in response to the letter received by your agency on July 29, 2005, requesting information and documents relating to Michigan State University's (MSU) activities relating to hazardous substances or pollutants transported, stored, treated or disposed at the above-referenced Facility.

MSU's Office of Radiation, Chemical and Biological Safety (ORCBS) is responsible for administering all policies and procedures associated with handling hazardous and radioactive waste streams. MSU began retaining hazardous waste records in 1979, and maintains its radioactive waste records in accordance with NRC requirements. MSU searched and found no documents showing that a sonotron or any similar item left MSU in 1961.

MSU's responses to your specific questions follow:

1. Describe in detail the business relationship between MSU and Safety Light.

MSU staff interviewed the Director of ORCBS and the Radiation Safety Officer. They indicated that there are no records or current knowledge of any past business relationship with Safety Light Corporation.

2. Did MSU ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite to the Site?



Michigan State University
C-124 Research Complex -
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East Lansing, MI
48824-1326
517/355-0153
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Again, based on interviews with ORCBS staff, MSU has no records or knowledge of any waste stream transported to the above-mentioned facilities.

4. Did MSU ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite at the Site?

With respect to the sonotron identified by you, we have no records relating to it or similar products being used at or shipped from MSU.

According to MSU's Radiation Safety Officer, however, a sonotron is an instrument with a sealed radioactive source wherein the radioactive material is sealed or encased in such a way as to prevent leakage or release.

The Radiation Safety Officer suggests that even if this instrument was sent from MSU, the radioisotope used in a sonotron, was Polonium 210, a nuclide of moderate risk that has a half-life of 138.8 days, a short half-life. As such, this device would have decayed to non-radioactive levels quickly. (That is why the sources had a short use life, because they decayed to non-radioactive levels and were no longer effective.)

At the time the putative source would have left MSU, it was likely that it had already decayed and was no longer useful, and no longer a health and safety threat. Therefore, the source did not present a high- or long-term risk. Even assuming the source was released from the encasement, it would not be a threat today.

6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

Based on interviews with ORCBS staff, and review of existing records, MSU has no knowledge of any other party that could provide a more detailed response.

7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, and then provide the names, titles, areas of responsibility, current addresses and telephone numbers of the persons from whom such information or documents may be obtained.

Based on interviews with ORCBS staff, and review of existing disposal records, MSU has no knowledge of any individuals that would have possession, custody or control of the requested documents.

- 8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.**

Based on interviews with ORCBS staff, and following review of our waste records, MSU is not aware of any other parties that have information to assist the EPA in its investigation.

- 9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:**

- a. Your document retention policy.**

The ORCBS has been keeping detailed hazardous waste disposal records since the office was formed in late 1979. Radioactive waste records are retained in accordance with NRC requirements

- b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction.**

MSU has no knowledge of how records were destroyed or dates.

- c. A description of the type of information that would have been contained in the documents.**

MSU has no knowledge of information that would have been contained in any such documents.

- d. The name, job title, and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.**

MSU has no knowledge of persons that would have produced these documents in 1961 or destroyed them.

MSU has made a good faith effort to provide the requested information. Should you have any questions or need further information, please contact Tom Grover, MSU's Environmental Compliance Officer at 355-6651.

Sincerely,

A handwritten signature in black ink, appearing to be 'Kein Eisenbeis', written over the word 'Sincerely,'.

Kein Eisenbeis, Director,
Office of Environmental and Occupational Safety

Cc: Theresa Kelley, Office of the General Counsel
Cordell Overby, Office of V.P. for Research and Graduate Studies
Abraham Ferdas, EPA Region 3

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**OFFICE OF RADIATION,
CHEMICAL & BIOLOGICAL SAFETY**

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